



SAFEGUARDING ADULTS AT RISK POLICY



DATE APPROVED

March 2025

APPROVED BY

Keele Students' Union Trustee Board

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1. Introduction

1.1. Keele Students' Union (Keele SU) is committed to creating a safe environment where every individual can thrive, free from abuse or neglect. This policy outlines our responsibilities and procedures to safeguard children and adults at risk.

1.2. This policy reflects the fact that Keele Students' Union has many members who may have care and support needs who may be vulnerable to abuse and harm and provides some services to under 18's.

1.3. This policy reflects the fact that Keele Students' Union should be a safe environment which promotes wellbeing and protects adults and children who may be at risk of harm or abuse.

1.4. All staff should be aware of our safeguarding responsibilities for adults and children who come to the Campus or are linked with the Union in any way.

1.5. All staff can play a part in safeguarding by recognising risks to adults and children and by knowing what action to take.

1.6. All staff are expected to undertake relevant training provided by Keele SU.

1.7. The Chief Executive Officer (CEO) of Keele Students' Union has leadership responsibility to oversee the Union's safeguarding arrangements. Safeguarding Officers should be the first point of contact for anyone who has any concerns in relation to safeguarding.

2. Policy Statement and Scope

2.1. Keele SU aims to protect all individuals who use our services, regardless of age, disability, gender, race, religion, sexual orientation, or marital status. We promote a robust safeguarding culture across all levels of the organisation.

2.2. This policy applies to all Keele SU staff, officers, volunteers, students, their families, and visitors. It covers all activities, including clubs and societies.

3. Legislation and the Legal Context

3.1 Our safeguarding responsibilities are informed by:

- The Care Act 2014
- The Children Act 1989 and 2004
- The Sexual Offences Act 2003
- The Mental Capacity Act 2005
- The Safeguarding Vulnerable Groups Act 2006
- The Human Rights Act 1998
- The Counter-Terrorism and Security Act 2015 (Prevent Duty)

3.2 Higher Education Institutions and Students' Unions are not specifically named in either the Children Act or the Care Act as having a duty to safeguard and protect children or adults unlike schools or Further Education Colleges. Universities have a duty of care to safeguard children, young people and adults at risk of harm and exploitation during their course or activity relating to the University and/or Students' Union.

3.3 Keele SU does however have a general duty of care under common law to take such steps as are reasonable to ensure that children, young people and adults who may be at risk are safe and that reasonably foreseen harm does not occur as a result of careless acts or omission on the part of the organisation.

4. Definition of Safeguarding

4.1. Safeguarding relates to protecting children and adults who may be vulnerable from all forms of abuse and exploitation.

4.2. There is no exhaustive list of what may constitute abuse or exploitation, but it includes physical, emotional, sexual, financial, neglect, online abuse, domestic abuse, human trafficking, and discriminatory abuse.

4.3. Safeguarding also relates to broader preventative responsibilities that are wide-ranging concerning the welfare and well-being of children and enabling people to reach their full potential as well as to stay safe and healthy.

5. Definition of Adults at Risk

5.1. Being vulnerable means the need for special care, support or protection because of age, disability, risk or abuse of neglect.

5.2. Vulnerable groups are groups of people who are at a higher risk of abuse or harm due to their characteristics and circumstances. It is the collective term for 'vulnerable adults' and 'children.'

5.3. The Safeguarding Vulnerable Groups Act 2006 aims to prevent unsuitable people from working with children and vulnerable adults in a role that involves regulated activity.

5.4. A vulnerable adult is someone aged over 18 who:

- may need community care services because of a mental or physical
- disability, their age or an illness
- is unable to protect themselves from harm or exploitation

5.5. A vulnerable adult may be someone who lives:

- alone
- with family or friends
- in a situation where they are dependent on others, such as in care home, sheltered accommodation or with domiciliary care

5.6. A vulnerable adult may be someone who:

- is older
- has a physical disability
- has a chronic long-term illness
- is addicted to alcohol or drugs
- has a learning disability
- has a severe communication impairment
- has autistic spectrum disorder
- is homeless
- has been subjected to domestic abuse or sexual abuse
- has been subjected to trafficking or sexual exploitation

6. Roles and Responsibilities

6.1. Trustee Board: Ensure policies and practices are in place, manage risks, and report incidents.

6.2. CEO (Safeguarding Lead): Monitor policy compliance, liaise with local authorities and safeguarding boards, maintain records, and report to the Trustee Board and Charity Commission in relation to serious incidents.

6.3. Safeguarding Officers: Act as contacts for safeguarding issues, maintain records, and contribute to policy reviews.

6.4. Managers: Ensure staff and volunteers are aware of and comply with the safeguarding policy.

6.5. All Staff and Volunteers: Complete training, report concerns, and maintain appropriate relationships.

7. Reporting and Managing Concerns

7.1. Immediate Danger: Call the police on 999.

7.2. Non-Emergency Concerns: Report to a Safeguarding Officer. If unavailable, contact the CEO or a member of the Leadership Team.

7.3. A Reporting Flowchart and Incident Reporting Form can be found in the Appendices of this Policy.

8. Confidentiality and Data Protection

8.1. Members of staff should never offer complete confidentiality. Be open and honest about why, what, how and with whom information will, or could be, shared and seek their agreement unless it is unsafe or inappropriate to do so.

8.2. It should always be made clear that information which suggests the possibility of an individual being a serious risk to themselves or others, which may give rise to concerns about the welfare of a child or adult, or relates to criminal activity, may need to be passed on.

8.3. GDPR is not a barrier to sharing information but provides a framework to ensure that personal information about a living person is shared appropriately. You can share information without consent if, in your judgement, that lack of consent can be overridden in the public interest.

8.4. Base your information sharing decisions on considerations of the safety and well-being of the person and others who may be affected by the actions that have been disclosed.

8.5. Information should only be shared with those people who need to know it, for example, the Safeguarding Officers/CEO, Social Services and, if appropriate, key safeguarding staff at Keele University.

9. Photography

9.1. Keele Students' Union celebrates the achievements of its members and representatives and is obliged to promote its activities and opportunities to all members. As such, there will be times when photographs and videos are taken.

9.2. Keele SU recognises the individuals' right to privacy, however, and so will:

- Publicise at large events when photos and video footage are being taken and the procedures for individuals to inform staff if they do not wish their image to be captured;
- Obtain the express permission of individuals that they are happy for their images to be taken when the image in question identifies the individual personally;
- If the individual is under 18, obtain the express permission of their parent/guardian/carer. If this is not possible for whatever reason, no image will be taken;
- When obtaining consent, Keele SU will inform the individual the context and purpose of the image and how and where it will be used.

10. Whistleblowing

10.1. Refer to the Staff Handbook for detailed procedures on whistleblowing.

11. Wellbeing

11.1. In addition to our statutory safeguarding responsibilities, Keele SU is committed to the ongoing wellbeing of our students and all who use our services. Students can face a variety of stressors including academic (exams and results), housing, financial and relational. If a concern does not reach the threshold for further action by Keele SU or the Local Authority, or a student has returned to a home overseas, we remain committed to supporting the individual's wellbeing and managing risk. We do this through early intervention including:

- Monitoring wellbeing
- Providing information on expected and safe behaviour from others.
- Signposting to relevant services close to them. This may be inside or outside of
- University services and may include police or social care services overseas, where appropriate.

11.2. During office hours, Keele SU or students can contact Student Services Student services - Keele University. The Student Services Centre is located in the Claus Moser Building and is open for first line support 9am to 5pm Monday to Friday* by phone 01782 734481 or email student.services@keele.ac.uk (*except Bank Holidays and University closure days).

12. Implementation

12.1. We adhere to the six principles of safeguarding: Empowerment, Prevention, Protection, Proportionality, Partnerships, and Accountability which can be found in *Appendix 7*. We ensure all staff and volunteers are trained and that safeguarding practices are regularly reviewed.

13. Prevent Duty

13.1. Keele University Students' Union is committed to the principles of the Prevent Duty under the Counter-Terrorism and Security Act 2015 and Martyn's Law, when it is introduced. We seek to prevent people from being drawn into terrorism and reduce the risk of terrorism happening in our facilities.

13.2. We will ensure that all relevant staff and volunteers:

- Understand what radicalisation is and why people may be vulnerable to being drawn into terrorism.
- Are aware of extremism and the relationship between extremism and terrorism.
- Know what measures are available to prevent people from becoming drawn into terrorism and how to challenge the extreme ideology that can be associated with it.
- Obtain support for people who may be exploited by radicalising influences by referring into the Staffordshire Police Prevent Team*.
- Comply with our obligations to prevent terrorism occurring in our venues, as they emerge, under Martyn's Law.

14. Safer Recruitment

14.1. We follow safer recruitment practices to ensure that staff and volunteers are suitable for their roles which can be found in *Appendix 3*.

15. Appendices

- **Appendix 1:** Definitions and Signs of Abuse (page 8)
- **Appendix 2:** Guidance for Interactions with Under 18's (page 10)
- **Appendix 3:** Safer Recruitment Procedures (page 12)
- **Appendix 4:** Reporting Flowchart (page 13)
- **Appendix 5:** Incident Reporting Form (page 14)
- **Appendix 6:** Important Contacts (page 16)
- **Appendix 7:** The Six Principles of Safeguarding (page 17)
- **Appendix 8:** Full Role Descriptions and Responsibilities (page 18)

Keele Students' Union Safeguarding Policy Appendices

Appendix 1: Definitions and Signs of Abuse

Definitions

- **Physical abuse:** Bodily assaults resulting in injuries (e.g., hitting, slapping, pushing, kicking), misuse of medication, restraint, or inappropriate sanctions.
- **Sexual abuse:** Rape, incest, acts of indecency, sexual assault, sexual harassment, or sexual acts to which the adult at risk has not consented.
- **Psychological/emotional abuse:** Threats of harm, controlling, intimidation, coercion, harassment, verbal abuse, enforced isolation, or withdrawal from services.
- **Neglect and acts of omission:** Ignoring medical or physical care needs, failure to provide access to appropriate health, social care, or educational services.
- **Financial or material abuse:** Theft, fraud, exploitation, pressure in connection with wills, property, or inheritance.
- **Discriminatory abuse:** Racist, sexist, or based on a person's disability, and other forms of harassment.
- **Self-neglect:** Failure to take care of own basic needs, neglecting care for personal hygiene and surroundings.
- **Modern Slavery:** Slavery, human trafficking, forced labour, domestic servitude, coercion, deception, and life of inhumane treatment.
- **Organisational abuse:** Denial of rights, denial of access to family, friends, Doctor, Solicitor, denial of access to money or information.
- **Domestic abuse:** Threatening behaviour, intimidation, violence between family members or those who are or have been intimate partners.
- **Cyber Bullying:** Making fun of another person online, repeatedly picking on another person through emails, text messages, or any technological means.
- **Forced Marriage:** A marriage in which one or both of the parties are married without their consent or against their will.
- **Mate Crime:** Vulnerable people being befriended by members of the community who go on to exploit and take advantage of them.
- **Radicalisation:** Inspiring new recruits, embedding extreme views, and persuading vulnerable individuals to the legitimacy of a cause.

Signs of Abuse

- **Physical abuse signs:** Unexplained falls, bruising, burns, injuries at different stages of healing, weight loss, ulcers, bed sores.
- **Sexual abuse signs:** Disclosure, medical problems, disturbed behaviour, fear or aggression towards one person.
- **Psychological/emotional signs:** Isolation, unkempt appearance, withdrawal, anxiety, change in appetite, insomnia, tearfulness.
- **Neglect signs:** Poor physical condition, inadequate diet, untreated injuries, poor personal hygiene.
- **Financial or material signs:** Unexplained inability to pay bills, sudden withdrawal of money, disparity between assets and living conditions.
- **Discriminatory signs:** Lack of respect, substandard service, exclusion from rights.
- **Self-neglect signs:** Not engaging with support, unwilling to meet care needs, unable to make informed decisions.
- **Modern slavery signs:** Physical or psychological abuse, not allowed independent travel, few personal belongings, living/working in the same place.
- **Organisational signs:** Poor standards, inflexible routines, lack of personal belongings, inappropriate physical intervention.
- **Domestic abuse signs:** Similar to any type of abuse or neglect.
- **Cyber Abuse signs:** Emotional upset during or after using the Internet, secretive digital life, withdrawal from family and friends.
- **Forced Marriage signs:** Running away from home, depression, poor performance at work or school, surprise engagement.
- **Mate Crime signs:** Bills not being paid, sudden lack of money, losing possessions, changing will.
- **Radicalisation signs:** Isolation, scripted speech, unwillingness to discuss views, disrespectful attitude, increased anger, secretiveness.

Appendix 2: Guidance for Interactions with Under 18's

1. Keele Students' Union representatives are expected to take reasonable steps to determine whether the people they are working with or who are participating in an event or activity (on or off campus) are under the age of 18 or have additional needs for support and protection.
2. If Keele Students' Union representatives or members are engaged in projects or activities, such as volunteering, that involve contact with children, young people or vulnerable adults, appropriate steps will be taken to ensure necessary Disclosure and Barring Service (DBS) checks are conducted.
3. Keele Students' Union representatives should take steps to avoid any unsupervised contact with anyone under the age of 18, as part of their duties. Any meetings with someone under the age of 18 should take place in the presence of at least one other Keele Students' Union representative or responsible adult. If this is genuinely not possible, due to the circumstances, any meeting should be in an open environment.
4. If events take place within the Students' Union, for example, in the bar or venue that involve the participation of under '18s, the organising party will be responsible for ensuring appropriate supervision of the children/young people present. Any concerns around this or the conduct of the participants will be raised by Keele Students' Union management with the organising party. Keele Students' Union management reserve the right to stop or cancel an event if they feel that the safety of participants is compromised or at risk.
5. Keele Students' Union recognises that there may be occasions where members may bring children with them onto campus, for example, attending an appointment with the ASK. In such situations, children must remain under the safe supervision of their parent/guardian/carer at all times.
6. Keele Students' Union representatives should not engage in sexual relationships or sexual activities with under 18s they meet in the course of their duties, due to the potential abuse of their position of power and influence. It is a sexual offence under the Sexual Offences Act 2003 for an adult to engage in sexual activity with a person under the age of 18 (even if the person is of the legal age of consent) where the adult is deemed to be in a position of trust. Where there are concerns related to abuse of power related to an individual's role and responsibility, irrespective of the age of the alleged victim, disciplinary action will be considered.
7. Keele Students' Union representatives (whether they are employees of Keele Students' Union or not) should never give an under 18 their home address, personal telephone or mobile number, personal email address, or social networking details.

8. Keele Students' Union recommends that its representatives (staff and students) and members take steps to ensure they do not accidentally put themselves in a position where an allegation can be made against them.
9. Keele Students' Union is committed to responding swiftly to any allegations of abuse or harm by its representatives and will invoke its disciplinary or complaints process as appropriate.
10. Keele Students' Union takes allegations that are found to be clearly vexatious or frivolous very seriously and will deem them a disciplinary – and potentially criminal – matter.

Appendix 3: Safer Recruitment Procedures

Safer Recruitment refers to a way of recruiting staff and volunteers which reduces the likelihood of recruiting an individual who may be a safeguarding risk. Our procedure for each role is:

1. Identify the tasks and responsibilities involved, and the type of person most suitable for the job.
2. Draw up the selection criteria and put together a list of essential and desirable qualifications, skills and experience.
3. All applicants should apply in writing and their application will cover their personal details, previous and current work/volunteering experience.
4. Measuring any application against the selection criteria.
5. If relevant to the post, applicants need to sign a declaration stating that there is no reason why they should be considered unsuitable to work with adults at risk. The Rehabilitation of Offenders Act (1974) requires that people applying for positions working with adults at risk must declare all previous convictions. A Disclosure and Barring (DBS) Check will be undertaken and assessed. They are also required to declare any pending case against them.
6. We will ensure the applicant understands that all information will be dealt with confidentially and will not be used against them unfairly.
7. Ask for photographic evidence to confirm the identity of the applicant e.g. their passport.
8. We may request to see documentation of any qualifications detailed by the applicant.
9. Always interview candidates (in the case of volunteers, an informal meeting is acceptable).
10. Request two written references from people who are not family members or friends and who have knowledge of the applicant's experience of working with adults at risk, if relevant to the post. We will ask the referee to also comment on their suitability for working with adults at risk.
11. If relevant to the post, we will ensure that our successful applicant obtains the Enhanced DBS as required from the Disclosure and Barring Service. They will be offered the role subject to satisfactory DBS checks.
12. We will include our safeguarding adults at risk policy in the induction process.
13. Adult Safeguarding training will be provided for all relevant staff and volunteers as part of induction.

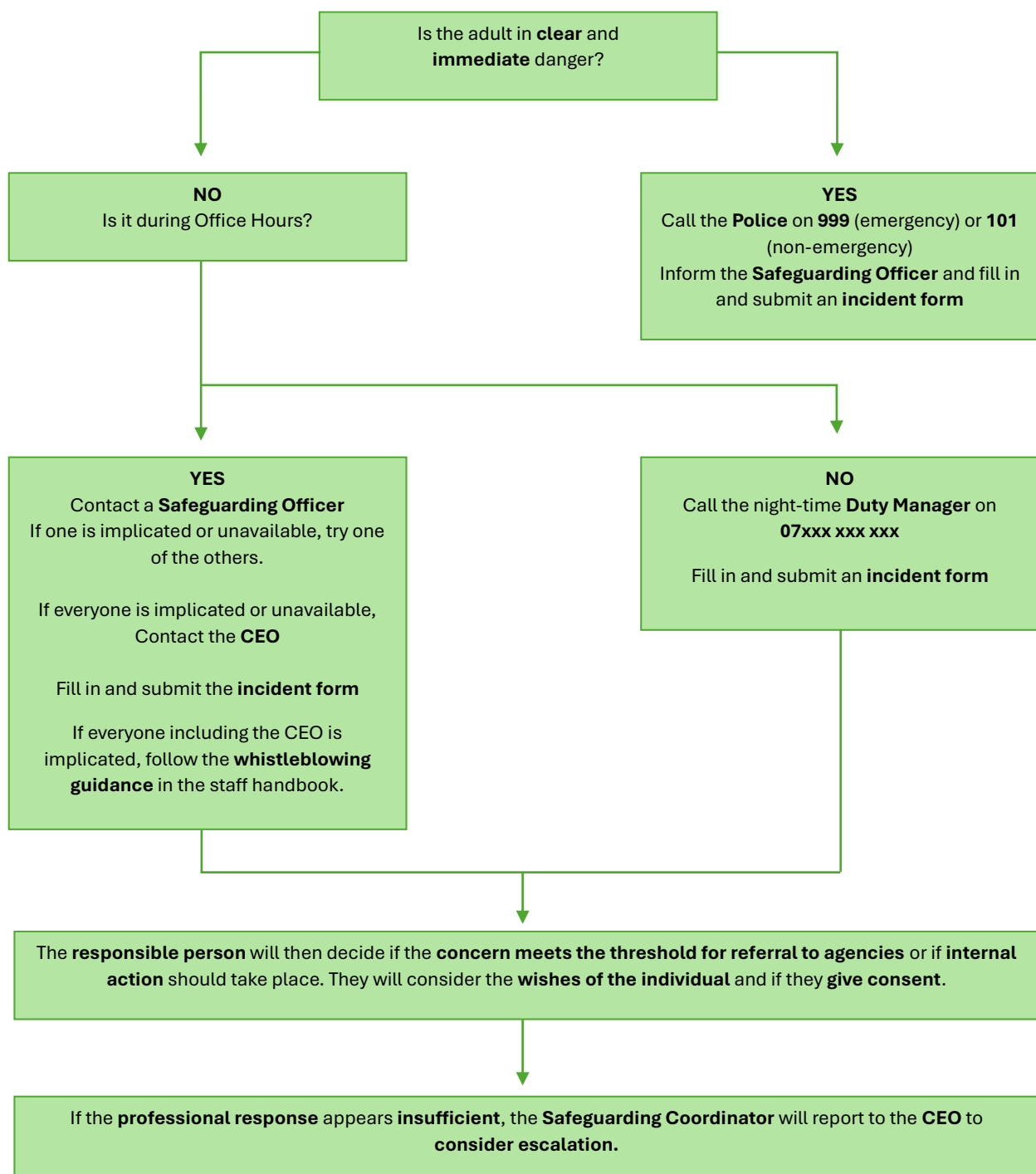
Appendix 4: Reporting Flowchart

Key Points:

Immediate danger: Call the police on 999.

Non-emergency concerns: Report to a Safeguarding Officer. If unavailable, contact the CEO or a member of the Leadership Team.

Maintain confidentiality and only share information with authorised personnel.



Appendix 5: Incident Reporting Form

Organisation

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Name of Person Reporting

| | |
|-----------------|--|
| Full Name | |
| Job Title | |
| Contact Details | |

Person at Risk Details

| | |
|----------------------------|--|
| Full Name | |
| Age | |
| Date of Birth | |
| Ethnicity | |
| Religion | |
| First Language | |
| Disability | |
| Family Member/Carer's Name | |
| Home Address | |
| Telephone Number | |

Are you reporting your concerns or reporting someone else's. Please give details.

| |
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| |
|--|

Brief description of what has prompted the concerns

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|----------------------------------|
| Details of harm caused to person |
| |

| |
|---|
| Immediate action required to protect person |
| |

| |
|---|
| What other information do you have which causes concern? Eg. Physical signs? Behavioural signs? Indirect signs? – do not ask leading questions, only state your concerns. |
| |

Have you spoken to the adult? If so, what was said? Did they agree to a referral? Do you deem them to be 'at risk'?

Have you spoken to the family member/carer(s)? if so, what was said?

Has anybody been alleged to be the abuser? If so, please give details

Are there any others at risk? If so, please give details

Have you consulted anybody else? Please give details

Further Information

| | |
|--------------------------------------|--|
| Person reported to | |
| Date reported | |
| Signature of person reporting | |
| Today's date | |

Actions Taken

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Notes relating to adult's views and wishes, information relating to mental capacity, and views of yourself making the referral

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Appendix 6: Important Contacts

- Staffordshire County Council Social Services: 0345 604 2719
- Stoke-on-Trent City Council Social Services: 0800 561 0015
- Staffordshire Police, non-Emergency: 101
- Crimestoppers: 0800 555 111
- NSPCC Helpline: 0808 800 5000
- Care Quality Commission (CQC): 03000 616 161
- Combined Mental Health Crisis Care: 0800 0 328 728 (option 1), 24/7
- Staffordshire Women's Aid: 0300 330 5959, 24/7
- Staffordshire Police Prevent Team: 01785 232054
- Staffordshire Adults Safeguarding Board: 01785 854071
- Forced Marriage Unit: 020 7008 0151 (M-F, 9-5), 020 7008 5000 (Out of Hours)

Appendix 7: The Six Principles of Safeguarding

| | |
|------------------------|--|
| EMPOWERMENT | <p>People supported & encouraged to make their own decisions and give informed consent</p> <p>A person who has been in an empowering safeguarding processes would say, “I am asked what I want as the outcomes from the safeguarding process and these directly inform what happens”.</p> |
| PREVENTION | <p>It’s better to act before harm occurs.</p> <p>A person who has been in a preventative safeguarding environment would say, “I receive clear and simple information about what abuse is, how to recognise the signs and what I can do to seek help”.</p> |
| PROPORTIONALITY | <p>Using the least intrusive response appropriate to the risk presented.</p> <p>A person who has been in a preventative safeguarding environment would say, “I am sure that the professionals will work in my interest and they will only get involved as much as needed.”</p> |
| PROTECTION | <p>There is support and representation for those in greatest need.</p> <p>A person who has been in a protective safeguarding environment would say, “I get help and support to report abuse and neglect. I get help so that I am able to take part in the safeguarding process to the extent to which I want.”</p> |
| PARTNERSHIP | <p>Local solutions through services working with their communities.</p> <p>A person who has been in a safeguarding environment with good partnerships would say, “I know that staff treat any personal and sensitive information in confidence, only sharing what is helpful and necessary. I am confident that professionals will work together and with me to get the best result for me.”</p> |
| ACCOUNTABILITY | <p>Anyone relevant should be accountable for the role they play in safeguarding, and responsibility should not be shirked.</p> <p>A person who has been in a safeguarding environment with strong accountability would say, “I know that everybody takes my concerns seriously. Nobody has been passive or uninterested.”</p> |

Appendix 8: Full Role Descriptions and Responsibilities

Chief Executive Officer (CEO)

The role of the CEO, as Safeguarding Lead must:

1. Ensure that this Policy is monitored and reviewed to ensure that it reflects current legislation and guidance on the protection of children and adults at risk of harm
2. Be the main point of contact for the University for safeguarding children and adults at risk of harm.
3. Engage with the Staffordshire and Stoke on Trent Adult Safeguarding Partnership Board and Local Authority Designated Officer.
4. Maintain confidential records of relevant cases and action taken in keeping with the Data Protection Act 2018.
5. Report to the Trustee board on safeguarding matters, both compliance and how the process is working in practice.
6. Report serious incidents to the Charity Commission.
7. Ensure staff and students are appropriately trained on safeguarding.
8. Monitor safeguarding performance and implement measures to ensure the process is appropriate and satisfactory

Safeguarding Officers

The role of the Safeguarding Officer is to:

1. Contribute to the review and monitoring of this policy to ensure that it reflects current legislation and guidance on the protection of children and adults at risk of harm.
2. Act as a contact with the University for safeguarding children and adults at risk of harm.
3. Engage with the Staffordshire and Stoke on Trent Adult Safeguarding Partnership Board and Local Authority Designated Officer.
4. Maintain confidential records of relevant cases and action taken in keeping with the Data Protection Act 2018.
5. Contributing to appropriate reports to the Trustee Board.

Managers

Managers are responsible for:

1. Having an appropriate awareness of the safeguarding policy and the requirements of legislation as they apply to the work of their department/team.
2. Ensuring that staff, student leaders and volunteers are made aware of and understand the Safeguarding policy along with its related procedures.
3. Ensuring that staff, student leaders and volunteers who require safeguarding training for their work receive this.
4. Working with HR to ensure that any staff and volunteers' roles that require a DBS check receive this.

All Staff, Student Leaders and Volunteers

All staff, student leaders and volunteers are responsible for:

- Completing appropriate training.
- Co-operating with supervisors and managers on safeguarding matters.
- Ensuring they maintain age and culturally appropriate relationships with children and
- adults at risk of harm.